

Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105

Inspection Date(s):	March 6 & 7, 2017		
Time:	Entry: 13:24pm (March 6)	Exit: 1:15pm (March 7)	
Media:	Water		
Regulatory Program(s)	Clean Water Act NPDES		
Company Name:	Venoco Inc.		
Facility or Site Name:	Platform Gail		
Facility/Site Physical Location:	Outer Continental Shelf, Santa Barbara, CA		
Geographic Coordinates:	34.108746, -119.395356		
Mailing address:	6267 Carpinteria Ave, Suite 100 Carpinteria, CA 93103		
Facility/Site Contact:	John Garnett	Title: Environmental Coordinator	
	Phone: 805-745-2170	Email: [HYPERLINK "mailto:john.garnett@venocoinc.com"]	
Facility/Site Identifier:	NPDES Permit CAG280000 / CAF000002		
NAICS:	211111		
SIC:	1311		
Facility/Site Personnel Participating in Inspection:			
	Name	Affiliation	Title
			Email
	John Garnett	Venoco	Env. Coordinator
			[HYPERLINK "mailto:john.garnett@venocoinc.com"]
	Steve Lawry	LTS Env.	Consultant
			[HYPERLINK "mailto:LawryLTS@sbcglobal.net"]
EPA Inspector(s):			
	W. Colby Tucker	EPA R9	Inspector
			[HYPERLINK "mailto:Tucker.WilliamC@epa.gov"]
	Elizabeth Aubuchon	EPA R9	Inspector
			[HYPERLINK "mailto:Aubuchon.Elizabeth@epa.gov"]
Federal/State/Tribal/Local Representatives:			
	Jim Salmons	BSEE	Env. Compliance
			[HYPERLINK "mailto:James.salmons@bsee.gov"]
Inspection Report Author:	W. Colby Tucker		415-972-3556
			Date:
Supervisor Review:			

	Ken Greenberg	415-972-3577
		Date:

SECTION I – INTRODUCTION

I.1 Purpose of the Inspection

The purpose of the inspection was to ensure that Venoco Inc. (Venoco or Discharger) is in compliance with the requirements of the Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) permit CAG280000 for facility number CAF00002 (Platform Gail). During the inspection, we evaluated the accuracy and reliability of the Discharger's self-monitoring and reporting program and the Facility onsite generated waste streams, treatment processes and discharges to the Pacific Ocean, a water of the United States. The announced inspection consisted of two parts: a records review (conducted onshore on March 6, 2017) and a general facility site visit (conducted offshore on March 8, 2017). The primary representative for the Discharger is John Garnett, Environmental Coordinator of Venoco.

SECTION II – FACILITY / SITE DESCRIPTION

II.1 Facility Description

Platform Gail is one of three oil and gas extraction platforms owned and operated by Venoco in the Santa Barbara Channel. Platform Gail is located about 11 miles off the coast of Oxnard, California in a federal oil and gas lease block known as the Sockeye field. In 1999, Venoco acquired Platform Gail and Platform Grace, another platform in federal waters, from Chevron. The two platforms are connected by underwater pipes and Platform Gail receives oil from Platform Grace. Platform Gail then sends processed oil on-shore to Carpinteria for metering and refining. The wells on Platform Gail produce crude oil, water, natural gas, and associated by-products, namely hydrogen sulfide.

Platform Gail is covered by the Master General Permit CAG280000. On April 17, 2017, Venoco, LLC announced that it has filed for bankruptcy under Chapter 11 of the Bankruptcy Code in the United State Bankruptcy Court for the District of Delaware.

II.2 Wastewater Sources

At the time of the inspection and within the past three years, the Platform Gail discharged at least six types of wastewater:

- Drilling Fluids and Cuttings (Discharge 001)
- Deck Drains (Discharge 004)
- Domestic and Sanitary Wastes (Discharge 005)
- Desalination Unit Discharge (Discharge 007)
- Fire Control System Water (Discharge 008)
- Noncontact Cooling Water (Discharge 009)

Note: The Permit enumerates 22 different potential discharges. Throughout the Permit, the discharges are sometimes referenced by their number in the parenthesis above.

Drilling Muds and Cuttings discharges may occur during well drilling. Sometimes Venoco elected to discharge drilling muds (August and September 2014) and other times Venoco captured drilling muds and cuttings for discharge in a waste facility onshore.

Depending on the activity on the Platform Gail, there are about 20 resident employees on Platform Gail at any given time who contribute to Domestic and Sanitary Wastes. The number of

people on board typically increases during daylight hours as non-resident employees, contractors, regulators, and other visitors travel to the platform. Most domestic waste, sink, shower, and toilet water, is commingled with the sanitary waste stream and routed to a Marine Sanitation Device (MSD) for treatment and discharge. Part II.E of the Permit discusses effluent limits and monitoring requirements associated with Domestic and Sanitary Wastes.

Platform Gail has a desalination unit that provides fresh water for various uses on the platform. The desalination

Fire Control System Water originates as seawater pumped through the main seawater intake and routed through the fire control system. If this water is discharged on deck during testing, then it is comingled with deck drainage. During testing at Platform Gail, fire water sometimes discharges directly to the Pacific Ocean. Part II.F of the Permit discusses effluent limits and monitoring requirements associated with Fire Control System Water.

Noncontact Cooling Water originates as seawater pumped through the main seawater intake and is pumped through various pipes to cool equipment. Operators add small amounts (0.2 – 0.5ppm) of chlorine to the seawater pumps as a biofilm inhibitor. Platform Gail has no effluent limit associated with this discharge, though Part II.F and Appendix C, Table C-1 of the Permit discusses monitoring requirements associated with noncontact cooling water.

The following are notable permitted discharges that do not appear to have been discharged in the past three years:

- Produced water (Discharge 002)
- Well Treatment Completion and Workover Fluids (Discharge 003)

Produced water is a by-product of oil and gas extraction. At Platform Gail, Produced Water is typically reinjected into wells to stimulate well production. Venoco representatives (John Garnett and Scott Bing (Person in Charge (PIC) during the inspection) stated that the platform is not currently able to discharge produced water; all produced water is either reinjected into wells or routed to a disposal well.

Operations on Platform Gail periodically produce Well Treatment Completion and Workover Fluids. Those fluids that are not lost downhole are surfaced and then routed to a disposal well. Venoco claims no discharge of these fluids.

Deck Drains on Platform Gail capture fluids and solids on the decks mobilized by precipitation, fire test water, or another source. Deck drains are routed to sumps that in turn are pumped to a disposal well.

II.3 Wastewater Treatment

II.3.i Sanitary Waste

The Marine Sanitary Device (MSD) receives and treats sanitary waste. Venoco employs a Type II MSD manufactured by Omnipure. A mixture of waste and seawater enters a receiving tank and flows through a macerator pump to create a slurry. The slurry then flows through the book cells for oxidation and disinfection through electrochlorination. Residual chlorine is measured daily.

II.4 Compliance History

Venoco has no self-reported effluent limit violations on Discharge Monitoring Reports (DMRs) from January 2014 to January 2017.

SECTION III – NARRATIVE & OBSERVATIONS

Drilling fluids and Cuttings (Discharge 001)

1. No drilling occurred while EPA inspectors Colby Tucker and Elizabeth Aubuchon (we) were on board.
2. According to John Garnett, Venoco contracts drilling to a third party.
3. Venoco maintains documents related to drilling fluids and cuttings. We conducted a spot check of the documents relating to Discharge 001 between 2014 and 2017. We noted that well E-29 discharged drilling fluids. We observed the required toxicity tests for drilling fluids and mud dumps starting in August 2014 and ending on September 2, 2014 for well E-29.
4. We observed chemical inventories relating to drilling fluids.

Deck Drains (Discharge 004)

5. We observed the deck drain sump.
6. We observed Howard Durler, a Venoco operator, perform the static sheen test. No sheen was observed.

Domestic and Sanitary Wastes (Discharge 005)

7. We observed the MSD and the Coast Guard approved certification.
8. Signs on the MSD suggest maintenance should occur both daily and weekly.
9. An operator describing how the MSD works said that maintenance occurs daily and weekly.
10. Daily maintenance consists of backflushing the macerator pump.
11. Weekly maintenance consists of opening the book cell (see Photo XX) and scrubbing the electrode plates with a brush.
12. Grey water bypasses the MSD and is commingled with MSD treated waste for discharge.

Desalination Unit Discharge (Discharge 007)

13. The desalination unit uses reverse osmosis to purify seawater into potable water.
14. Sand filters associated with the desalination unit are cleaned and recharged onshore.
15. See Attachment XX for a schematic of desalination system.

Noncontact Cooling Water (Discharge 009)

16. The noncontact cooling water has two intakes, one at -116 feet and -92 feet (see Attachment XX). This water is used for cooling, desalination, MSD, and hypochlorite production, among other uses.

17. Intake water flows through a strainer to remove debris and organic matter (fish, crabs, and
18. Hypochlorite injection occurs into the system occurs at the pumps to address biofouling of the pumps and piping throughout the system.
19. We observed the compliance point for the chlorine effluent limit.

SECTION IV – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation by EPA.

We do not have any areas of concern in regards to Platform Gail.

SECTION VI – DOCUMENTS REQUESTED DURING INSPECTION AND ANALYTICAL RESULTS

Received:

1. Engineering Flow Diagram – Production Water Surge – NO. C6 – 1757
2. Engineering Flow Diagram – Emergency Drains and Sump – NO. 008-10-201
3. Produced Water Discharge Sampling and Monitoring Procedure (Updated 2/11/2015) (1 page)
4. OCS NPDES Monitoring Procedures for the Dec. 2004 General NPDES Permit CAG 2800000 (Updated 12/07) (8 pages)
5. Beta Offshore Spill History (Revised 5/4/2016) (4 pages)
6. Daily Morning Reports March 1 – March 9, 2017 (4 pages each)
7. Laboratory results for produced water discharges on:

8. Work Orders associated with water discharges on:

APPENDICES

Appendix 1 – Photograph Log

Appendix 2 – Sign in Sheet

Appendix 3 – Piping and Instrumentation Drawing of Produced Water Treatment Train

Appendix 5 – Simplified Schematic of Produced Water Surge Tank and Emergency Sump

Appendix 1 – Photograph Log

The photographs were taken during the inspection by Colby Tucker. Original copies of the photos are maintained by EPA Region 9.



Photograph 1. View of the seawater RO unit.



Photograph 2. View of the freshwater RO unit.



Photograph 3. Discharge pipe for RO concentrated discharge.



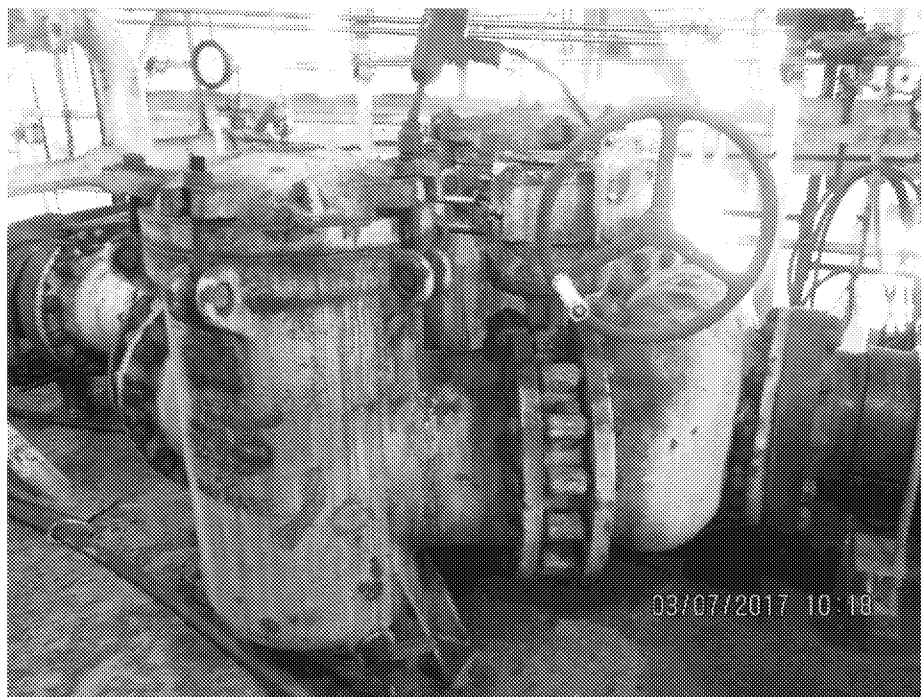
Photograph 4. View of the Omnipure system and macerator used on site to treat sanitary waste water.



Photograph 5: View of the pipe used for Gray water and M04 Discharge.



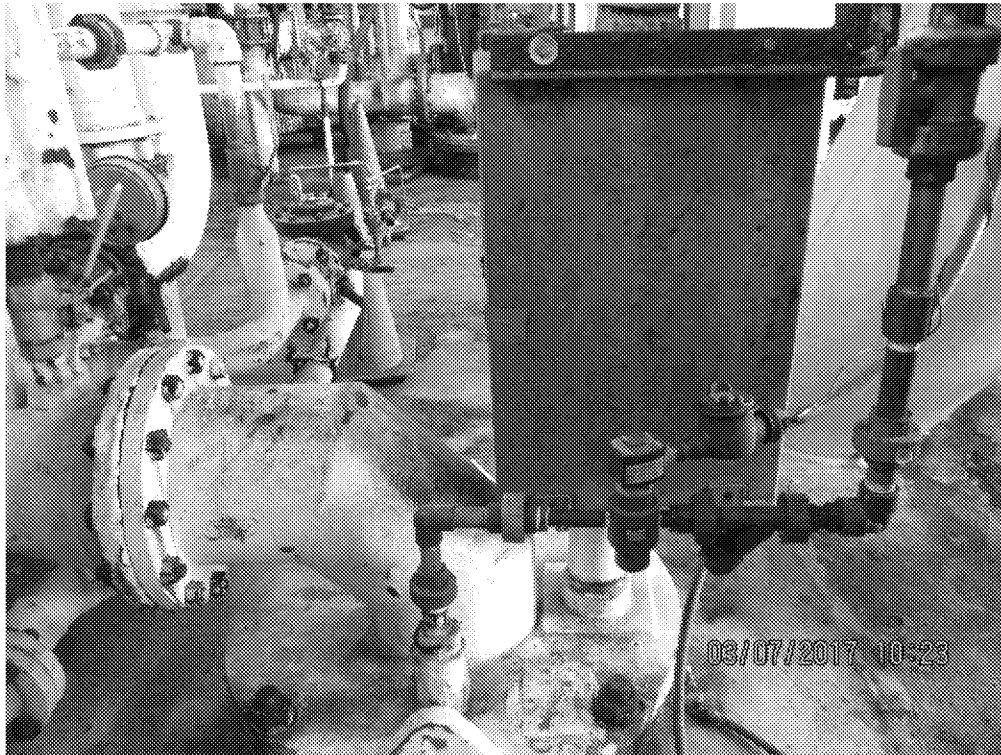
Photograph 6. View of the backside of the Omnipure system. Each bolt must be removed to perform maintenance of this system.



Photograph 7. View of the seawater strainer used when seawater is pulled up for use as non-contact cooling water.



Photograph 8. Interior view of the replacement seawater strainer. It will be installed later this year.



Photograph 9. View of the chlorine injector for the seawater non-contact cooling water



Photograph 10. View of an empty well slot.



Photograph 11. View of sample collection for sheen test. This pipe leads to the disposal pile.



Photograph 12. View of interior casing leading to the disposal pile.



Photograph 13. View of the sampling point for non-contact cooling water.



Photograph 14. View of RO discharge



Photograph 15. View of the gray water and omnipure discharge pipe.